

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. 03- _____
v.	:	DATE FILED: _____
SAM KONG,	:	Violations: 26 U.S.C. § 7206(1)
a/k/a “Sam Yee Kong,”		(False Tax Returns -
a/k/a “Siu Yee Kong”	:	2 Counts)

INDICTMENT

COUNT ONE

(26 U.S.C. § 7206(1))

THE GRAND JURY CHARGES THAT:

At all times material to this indictment:

1. Defendant Sam Kong, a/k/a “Sam Yee Kong,” a/k/a “Siu Yee Kong,” was the president of Sam Kong Fashions, Inc., a sewing assembly business that was located in Philadelphia, Pennsylvania.

2. Defendant Sam Kong, a/k/a “Sam Yee Kong,” a/k/a “Siu Yee Kong,” was the sole shareholder of Sam Kong Fashions, Inc.

3. On or about May 5, 1997, in the Eastern District of Pennsylvania,
defendant

SAM KONG,
a/k/a "Sam Yee Kong,"
a/k/a "Siu Yee Kong,"

a resident of Philadelphia, Pennsylvania, did willfully make and subscribe a U.S. Corporation Income Tax Return, Form 1120, for Sam Kong Fashions, Inc. for the calendar year 1996, which was verified by a written declaration that it was made under the penalties of perjury and was filed with the Internal Revenue Service, Philadelphia Service Center, Philadelphia, Pennsylvania, which income tax return he did not believe to be true and correct as to every material matter in that the return reported gross receipts/sales in the amount of \$286,180 (Line 1a), and salaries, wages, and compensation of officers in the total amount of \$177,280 (Lines 12 and 13), when in fact, as defendant SAM KONG, a/k/a "Sam Yee Kong," a/k/a "Siu Yee Kong" well knew, Sam Kong Fashions, Inc. had gross receipts/sales in addition to that stated, and salaries, wages and compensation of officers in addition to that stated.

In violation of Title 26, United States Code, Section 7206(1).

COUNT TWO

(26 U.S.C. § 7206(1))

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 and 2 of Count One are alleged as if fully restated.

2. On or about March 22, 1998, in the Eastern District of Pennsylvania, defendant

SAM KONG,
a/k/a "Sam Yee Kong,"
a/k/a "Siu Yee Kong,"

a resident of Philadelphia, Pennsylvania, did willfully make and subscribe a U.S. Corporation Income Tax Return, Form 1120S, for Sam Kong Fashions, Inc. for the calendar year 1997, which was verified by a written declaration that it was made under the penalties of perjury and was filed with the Internal Revenue Service, Philadelphia Service Center, Philadelphia, Pennsylvania, which income tax return he did not believe to be true and correct as to every material matter in that the return reported gross receipts/sales in the amount of \$306,149 (Line 1a), and salaries, wages, and compensation of officers in the amount of \$185,930 (Lines 12 and 13), when in fact, as defendant SAM KONG, a/k/a "Siu Yee Kong," a/k/a "Sam Yee Kong" well knew, Sam Kong

Fashions, Inc. had gross receipts/sales in addition to that stated, and salaries, wages, and compensation of officers in addition to that stated.

In violation of Title 26, United States Code, Section 7206(1).

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney